

Prior to entry of this amendment, Claims 1-20 were pending in the application. Claims 1-20 have been rejected. Claim 2 has been canceled.

Claim Rejections Under 35 U.S.C. § 103(a)

The Examiner has rejected Claims 1-20 under 35 U.S.C. §103(a) as being unpatentable over *Van de Vanter* in view of *Gipson*.

Rejection of Claim 1

Applicant respectfully traverses the rejection of Claim 1 because the steps of Claim 1 are not described by the prior art. Applicant respectfully submits that *Van de Vanter* is directed to a computer program editor, whereas the invention of Claim 1 deals with editing electronic documents, not computer programs.

The Examiner has asserted that *Van de Vanter* teaches a method of text editing by managing movement and placement of a cursor along with white space. Specifically, the Examiner has cited Col. 12, lines 22-29 as reciting the step of “collecting context information regarding a location of a cursor in the electronic document”, as required by Claim 1. However, Applicant respectfully submits that this cited text does not describe “collecting context information”. The cited text describes “movement and placement of the cursor”. Applicant respectfully submits that a description of movement and placement of a cursor (as in *Van de Vanter*) does not describe collecting context information regarding a location of a cursor, as required by Claim 1. This context information, in one embodiment, is described in detail in Table 1 at pp. 13-16 of the present application. Applicant respectfully submits that such context information is not described as being collected in *Van de Vanter*.

Applicant respectfully submits that *Gipson* does not describe the step of “changing a presentation of the cursor to indicate an anticipated location of the insertion point and the type of formatting that will be applied to text and objects located in close proximity to the cursor location”, as required by Claim 1. First, Applicant respectfully submits that *Gipson* does not describe

changing a presentation of a cursor. *Gipson* describes an autocorrecting or autoformatting feature. Applicant respectfully submits that autocorrecting is different than “changing a presentation of the cursor”, as required by Claim 1.

Applicant submits that the Examiner may be interpreting Claim 1 to include the step of actually changing the formatting of text or objects. Instead, Applicant respectfully submits that Claim 1 includes the step of changing a cursor presentation to visually indicate to the user what formatting will be applied to the text (if the user accepts the insertion point). For example, see pp. 28-29 of the present application discussing a left alignment icon, a right alignment icon, an indent icon, etc. So, in one embodiment, the presentation of the cursor may be changed from a cursor to a left alignment icon to indicate that the text in close proximity to the cursor will be left-aligned should the user accept the insertion point. Applicant respectfully submits that this step of “changing a presentation of the cursor to indicate an anticipated location of the insertion point and the type of formatting that will be applied to text and objects located in close proximity to the cursor location” is not described by the cited references.

Applicant respectfully submits that *Van de Vanter* does not describe the step of “determining whether an indication has been received to place the insertion point in the electronic document”, as required by Claim 1. The Examiner has cited lines 22-29 of Col. 12 as reciting this step. However, the cited text simply describes “movement and placement of the cursor”. There is no description of an indication to place an insertion point. In fact, an insertion point is not even mentioned in the cited text. Only a cursor is mentioned and a cursor is different than an insertion point. (See Figs. 4A-4B of the present application).

Moreover, Applicant respectfully submits that there is no motivation to combine the teachings of *Van de Vanter* with the teachings of *Gipson*. Applicant respectfully submits that *Van de Vanter* is directed to a computer program editor, whereas *Gipson* relates to word processing documents. It would be counterintuitive to combine the methods of autoformatting disclosed in

Gipson with a computer program editor because computer programs are formatted in a completely different manner than are word processing documents.

Therefore, for all the reasons asserted above, the rejection of Claim 1 is traversed. Applicant requests that the Examiner allow Claim 1.

Rejection of Claim 3

The rejection of Claim 3 is respectfully traversed for all of the reasons asserted above with regard to Claim 1.

As described above with regard to Claim 1, Applicant respectfully submits that the step of “determining whether an indication has been received to place the insertion point in the electronic document” is not described by *Van de Vanter*. Claim 3 adds the recitation that this step comprises “determining whether a button on a mouse has been double-clicked”. The Examiner has cited Col. 9, lines 42-44 of *Van de Vanter*. While the cited text does refer to mouse clicks, Applicant respectfully submits that the cited text does not refer to the mouse clicks as being indications to place the insertion point in a document, as required by Claim 3.

For all of the above reasons, Applicant requests that the Examiner withdraw the rejection and allow Claim 3.

Rejection of Claim 4

The rejection of Claim 4 is respectfully traversed for all of the reasons asserted above with regard to Claim 1. Applicant requests that the Examiner withdraw the rejection and allow Claim 4.

Rejection of Claim 5

The rejection of Claim 5 is respectfully traversed for all of the reasons asserted above with regard to Claim 1.

Moreover, Applicant respectfully submits that Claim 5 includes the recitation of adding and deleting properties to place the insertion point in the electronic document. *Gipson* describes adding and deleting character strings to perform autoformatting (automatic replacement,

capitalization or de-capitalization). This autoformatting is not the same as placing an insertion point in the electronic document, as required by Claim 5. Therefore, the step of adding and deleting properties to place the insertion point in the electronic document is not described by *Gipson*.

For all of the above reasons, Applicant requests that the Examiner withdraw the rejection and allow Claim 5.

Rejection of Claim 6

The rejection of Claim 6 is respectfully traversed for all of the reasons asserted above with regard to Claim 1. Applicant submits that *Van de Vanter* does not describe collecting context information as described above with regard to Claim 1. Moreover, *Van de Vanter* does not describe collecting context information in response to a change in location of the cursor, as required by Claim 6.

For all of the above reasons, Applicant requests that the Examiner withdraw the rejection and allow Claim 6.

Rejection of Claim 7

The rejection of Claim 7 is respectfully traversed for all of the reasons asserted above with regard to Claim 1.

Moreover, Applicant respectfully submits that Claim 7 includes the recitation of “matching the collected context information with one of a plurality of triggers and selecting the rule associated with the matched trigger as the coinciding rule”. *Gipson* describes adding and deleting character strings to perform autoformatting (automatic replacement, capitalization or de-capitalization). This autoformatting is not the same as placing an insertion point in the electronic document, as required by Claim 7. Applicant respectfully submits that the rule selection of *Gipson* is irrelevant to the rule selection in the present invention because *Gipson* deals with autoformatting and does not describe placing an insertion point in a document as described by the present invention.

For all of the above reasons, Applicant requests that the Examiner withdraw the rejection and allow Claim 7.

Rejections of Claims 8 and 9

The rejections of Claims 8 and 9 are respectfully traversed for all of the reasons asserted above with regard to Claim 7.

Moreover, Applicant respectfully submits that Claim 8 includes the recitation of “performing the sequence of formatting steps associated with the coinciding rule”. *Gipson* describes adding and deleting character strings to perform autoformatting (automatic replacement, capitalization or de-capitalization). This autoformatting is not the same as placing an insertion point in the electronic document, as required by Claim 8. Applicant respectfully submits that the formatting of *Gipson* is irrelevant to the formatting in the present invention because *Gipson* deals with autoformatting and does not describe placing an insertion point in a document as described by the present invention. Furthermore, *Gipson* does not describe the rules or formatting that are necessary to place an insertion point in an electronic document.

For all of the above reasons, Applicant requests that the Examiner withdraw the rejection and allow Claims 8 and 9.

Rejection of Claim 10

The Examiner has rejected Claim 10 for substantially the same reasons as Claim 1. Therefore, the rejection of Claim 10 is respectfully traversed for all of the reasons asserted above with regard to Claim 1. However, Applicant respectfully submits that Claim 10 is directed to a method for displaying a cursor rather than a method for placing an insertion point. The difference will be discussed below.

Pages 28-29 of the present application describe changing the cursor display to suggest the anticipated insertion point location such as displaying the cursor as a left alignment icon. Thus, as the user moves the cursor to different points in the document, the cursor will be displayed as different icons, thus suggesting an anticipated insertion point. Claim 10 is directed to

determining one of a plurality of cursors to display and displaying the associated cursor. The references cited by the Examiner do not describe a plurality of cursors not do they describe displaying an associated cursor, as required by Claim 10.

For all of the above reasons, Applicant requests that the Examiner withdraw the rejection and allow Claim 10.

Rejection of Claim 11

The rejection of Claim 11 is respectfully traversed for all of the reasons asserted above with regard to Claim 10.

Moreover, Applicant respectfully submits that Claim 11 includes the recitation “wherein the associated cursor indicates the anticipated location of an insertion point”. The Examiner has asserted that *Van de Vanter* discloses presenting an I-beam cursor. Applicant respectfully submits that displaying an I-beam cursor is well-known in the art. However, the I-beam cursor described in *Van de Vanter* is not associated with a coincinding rule and chosen from a plurality of cursors, as required by Claim 11.

For all of the above reasons, Applicant requests that the Examiner withdraw the rejection and allow Claim 11.

Rejection of Claim 12

The rejection of Claim 12 is respectfully traversed for all of the reasons asserted above with regard to Claim 10.

Moreover, Applicant respectfully submits that *Van de Vanter* does not describe different cursors (left alignment icon, right alignment icon, center alignment icon, text wrap icon) as required by Claim 12. The only cursor shown by *Van de Vanter* is the I-beam cursor. The Examiner has asserted that the alignment markers of *Van de Vanter* anticipate these cursors. Applicant respectfully submits that these alignment markers are fixed whereas a cursor in the present invention is movable and may change as the user moves the cursor from point to point in the document. For example, under the invention of Claim 12, the cursor may change from a left

alignment icon to a right alignment icon depending on the location of the cursor in the document. *Van de Vanter* does not describe these different cursors.

For all of the above reasons, Applicant requests that the Examiner withdraw the rejection and allow Claim 12.

Rejections of Claims 13 and 14

The rejections of Claims 13 and 14 are respectfully traversed for all of the reasons asserted above with regard to Claim 4 because the Examiner has rejected Claims 13 and 14 for the same reasons as Claim 4.

Additionally, Applicant asserts that Claims 13 and 14 are different from Claim 4 because they relate to a method for displaying a cursor. Thus, with regard to Claims 13 and 14, Applicant requests that the Examiner review the arguments related above to Claim 10.

For all of the above reasons, Applicant requests that the Examiner withdraw the rejection and allow Claims 13 and 14.

Rejection of Claim 15

The Examiner has rejected Claim 15 for substantially the same reasons as Claims 4, 8 and 10. Thus, the rejection of Claim 15 is respectfully traversed for all of the reasons asserted above with regard to Claims 4, 8 and 10.

Moreover, Applicant respectfully submits that Claim 15 includes the step of “determining whether the location of the insertion point matches the location of the cursor”. The Examiner has asserted that Col. 36, lines 64-67 through Col.37, lines 1-3 of *Van de Vanter* describe this step. Applicant respectfully submits that the cited text simply refers to adjusting the **size** of the horizontal portions of an I-beam and does not describe location, or matching the location of the insertion point to the location of the cursor, as required by Claim 15. This step is not described by the cited references.

For all of the above reasons, Applicant requests that the Examiner withdraw the rejection and allow Claim 15.



Rejection of Claim 16

The rejection of Claim 16 is respectfully traversed for all of the reasons asserted above with regard to Claim 8 because the Examiner has rejected Claim 16 for the same reasons as Claim 8.

Additionally, Applicant asserts that the arguments presented above with regard to Claim 15 should be considered with regard to Claim 16.

For all of the above reasons, Applicant requests that the Examiner withdraw the rejection and allow Claim 16.

Rejections of Claims 17 and 18

The rejections of Claims 17 and 18 are respectfully traversed for all of the reasons asserted above with regard to Claim 16. For all of the above reasons, Applicant requests that the Examiner withdraw the rejections and allow Claims 17 and 18.

Rejections of Claims 19 and 20

The rejections of Claims 19 and 20 are respectfully traversed for all of the reasons asserted above with regard to Claim 1.

Additionally, Applicant asserts that Claims 19 and 20 are different from Claim 1 because they comprise additional steps not disclosed by the prior art. Applicant respectfully submits that the Examiner has failed to identify how these steps are disclosed in *Van de Vanter*.

For all of the above reasons, Applicant requests that the Examiner withdraw the rejection and allow Claims 19 and 20.

In view of the foregoing, Applicants respectfully submit that the pending claims, as amended, are patentable over the cited references. The preceding arguments are based only the arguments in the Official Action, and therefore do not address patentable aspects of the invention that were not addressed by the Examiner in the Official Action. The claims may include other elements that are not shown, taught, or suggested by the cited art. Accordingly, the preceding argument in favor of patentability is advanced without prejudice to other bases of patentability.



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CONCLUSION

The foregoing is submitted as a full and complete response to the Office Action mailed January 20, 2000. Please allow the pending claims because, as shown above, they are patentable over the art of record. If the Examiner believes that there are any issues that can be resolved by a telephone conference, or that there are any informalities that can be corrected by an Examiner's amendment, please call Todd Mitchem at (404) 949-2418.

Respectfully submitted,

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